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UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

Paul Sapan, Plaintiff

V.

Crystal Lending Group, Inc., and Christopher James Cricks, Defendants

Case No.: 8:24-cv-02530-JWH-KES

NOTICE OF WITHDRAWAL OF MOTION FOR JUDGMENT ON THE PLEADINGS WITH LEAVE TO REFILE

TO THE HONORABLE COURT AND ALL PARTIES HEREIN:

PLEASE TAKE NOTICE that Defendant, **Christopher James Cricks**, representing himself pro se, hereby withdraws the previously filed **Rule 12(c) Motion for Judgment on the Pleadings**, filed on **01/21/2025**, without prejudice and with leave to refile. This withdrawal is made to ensure full compliance with **Local Rule 7-3**, which requires the parties to meet and confer telephonically before filing a motion.

Statement of Compliance

- 1. After filing the Rule 12(c) motion, I conferred telephonically with Plaintiff's counsel, **Christopher Reichman**, on 01/22/2024. During this discussion, we addressed the issues raised in the motion and the legal arguments pertinent to this case.
- 2. To fully comply with Local Rule 7-3, I will refile the Rule 12(c) motion after a period of seven (7) days, allowing the Court and all parties sufficient time to process this notice of withdrawal.
- Additionally, I reserve the right to file a Rule 56 Motion for Summary Judgment, which
 would allow the introduction of evidence supporting my position that there are no genuine
 issues of material fact in this case.

4. Explanation of Oversight

As a self-represented litigant, I inadvertently overlooked the procedural requirement to meet and confer prior to filing the motion. I am still learning the legal

process and am making every effort to comply with the Court's rules and procedures. This oversight was unintentional, and I am now taking corrective action to ensure compliance.

Next Steps

- I will file a **declaration of compliance with Local Rule 7-3** in conjunction with the refiled motion to confirm adherence to the procedural requirements.
- The refiled motion will be identical in substance to the withdrawn motion, except for any necessary procedural updates.

This withdrawal is made in good faith to ensure procedural compliance and to allow the Court to address the issues presented without procedural disputes.

DATED: January 22, 2025

Respectfully submitted,

Christopher James Cricks

Christopher Cricks

Defendant, Pro Se

Crystal Lending Group, Inc.

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